



~~DOCKET FILE COPY ORIGINAL~~

December 7, 2005

DOCKET FILE COPY ORIGINAL

Commission's Secretary
Office of the Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE - Suite 110
Washington, D.C. 20002

Re: Alltel Communications, Inc. ETC Petitions,
CC Docket No. 96-45, DA 05-3005

Access to affordable telecommunications services is critical for rural consumers. Rural consumers rely on the utility and convenience of mobile telecommunications services for voice communications, email and internet access, and emergency services. Increasingly, consumers expect their wireless phones to work, regardless of their location, but yet the cost of serving rural areas can be prohibitively expensive. In recognition of this fact, Congress and the FCC have established a competitive universal service system that allows eligible telecommunications carriers (ETCs) to receive support for providing service in rural areas.

Alltel Communications, Inc. (Alltel) has filed an application with the FCC seeking ETC status in rural areas of the state of Florida. I strongly support Alltel's application for the following reasons that I will more fully explain below: (1) the value of universal service as a national goal will be preserved and enhanced by making funding available for wireless services that consumers increasingly rely on for their telecommunications needs; (2) rural communities and consumers, in particular, will benefit having access to wireless services throughout the designated service areas; and (3) Alltel has a strong commitment to rural America, but will not be able to implement its universal service plans to the benefit of rural communities and consumers without designation as an ETC.

The value of universal service as a national goal will be preserved and enhanced by making funding available for wireless services that consumers increasingly rely on for their telecommunications needs. Today, a consumer's concept of connection to the public switched network has shifted from connection to locations to connection to consumers themselves. Several factors confirm the importance of wireless service to consumers, including: growth in wireless and flattening or decline in wireline penetration; growth in wireless usage and declines in wireline usage; substitution of wireless for wireline access and usage; declining wireless prices; and wireless service characteristics that are of value to consumers. In keeping with this shift in paradigm, universal service is no longer preserved and advanced by funding only network connections via wireline facilities. Instead, the public interest is served by wireless services being eligible for universal service funding.

Rural communities and consumers, in particular, will benefit having access to wireless services throughout the designated service areas. Universal service is a government policy for the benefit of rural communities and consumers. This policy can only be successful if it evolves over time to meet the needs of rural communities and consumers. Today, the need of rural communities and consumers is access to wireless services. Whether it is being able to make and receive calls at home, on the road, or in an emergency situation, wireless service makes a difference in the lives of rural consumers. Furthermore, a rural community's economic development depends upon wireless service, and many consumers will not reside in an area that does not have access to wireless service. Universal service funding for wireless services will allow rural America to keep pace with urban areas in terms of access to comparable telecommunications services.

Alltel has a strong commitment to rural America, but will not be able to implement its universal service plans to the benefit of rural communities and consumers without designation as an ETC. Alltel has a strong track record of serving rural America. Its prior designation as an ETC in non-rural areas has benefited these communities and consumers. Expanding Alltel's ETC designation to rural areas will result in the construction of new facilities to serve previously unserved areas, such as Leon County, access to services needed in rural areas, such as expanded calling areas, internet and email access, and better service quality.

In sum, I urge the FCC to expeditiously grant the applications of Alltel for designation as an ETC in rural areas.



Devoe Moore
3550 Mahan Dr.
Tallahassee, FL

32311